**HOUNSLOW COMMUNITY TRANSPORT**

**DATA PROTECTION POLICY**

Data Protection Legislation

On 25 May 2018 the Data Protection Act (DPA) 1998 will be replaced by the General Data Protection Regulation (GDPR). This legislation places responsibilities and liabilities on Hounslow Community Transport (HCT) as an organisation that collects and processes personal data

This Regulation affects every customer and every employee of HCT, as most of our information is held electronically or in structured manual records

If these records contain personal data then HCT must be very careful to whom we disclose the information. If the information is disclosed, even accidentally, HCT can be held liable.

What is Personal Data?

Personal Data is any information relating to an identified or identifiable natural person. Personal data will therefore cover basic details such as name, address, date of birth and telephone numbers

Statement of Policy

HCT needs to collect and use information about people with whom it works in order to operate and carry out its functions. These may include members of the public, current, past and prospective employees, clients and customers and suppliers. This personal information must be handled and dealt with properly however it is collected, recorded and used and whether it is on paper, in computer records or recorded by other means

HCT regards the lawful and appropriate treatment of personal information as very important to its successful operations and essential to maintaining confidence between HCT and those with whom it carries out business. HCT therefore fully endorses and adheres to the Principles of the General Data Protection Regulation

Handling personal data

HCT will:

Strive to collect and process only the personal data or information which is needed

Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted

Strive to ensure information is accurate

Not keep information for longer than is necessary

Ensure that all personal information obtained by HCT is securely held with only authorised staff having access

All staff will receive annual refresher training on the HCT Data Protection Policy and in particular the handling of personal data and its secure retention. All new staff will receive such training upon joining HCT

The Chief Officer will undertake audits at least once a year to ensure that HCT maintains compliance with the DPA and GDPR - these audits will include the security of personal information and its management by staff

Securely destroy personal data which is no longer needed

Take appropriate technical and organisational security measures to safeguard personal information (including unauthorised or unlawful processing and accidental loss or damage of data)

Ensure that there is general information made available to the public of their rights to access information

Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation

These rights include:

The right to be informed

The right of access to personal information

The right to request rectification

The right to request erasure

The right to restrict processing in certain circumstances

The right to data portability

The right to object to processing

The Principles of Data Protection

HCT will comply with the following six principles of good practice.

Summarised, the principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals

2. Collected for specified, explicit and legitimate purposes and not further processed in an manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes

3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

4. Accurate and where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are deemed inaccurate, having regard to the purposes for which they are processed, are erased or rectified with immediate effect

5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals

6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures in accordance with the rights of data subjects under the Act

HCT will comply with the DPA /GDPR conditions for the processing of any personal data. It also makes the distinction between personal data and 'special category' data

Personal data is defined as any information relating to an identified or identifiable natural person

Special category data is defined as personal data consisting of information as to:

Racial or ethnic origin

Political opinion

Religious/philosophical beliefs

Trade union membership

Physical or mental health or condition

Sexual life or sexual orientation

Biometric data

HCT will only request information on Racial or ethnic origin, as this has been requested by the London Borough of Hounslow for the reports that HCT provides them

Fair Processing Notice

HCT is committed to compliance with DPA/GDPR. Keeping personal information accurate and secure is a vital part of providing efficient services

HCT will only use the information it holds for the purpose provided. It will also only collect the minimum information necessary to fulfil that purpose

When information is provided the provider will be told what it will be used for and whom it will be shared with

HCT also works closely with the London Borough of Hounslow and occasionally needs to share information with them in order to deliver services supported by them. However, HCT will not supply information unless it is satisfied that equal measures are in place to protect the information from unauthorised access. HCT will also not supply information to any organisation for marketing purposes

Further Information

Further information about the use of personal data or to make a subject access request for copies of personal data held by HCT should make contact with:

Peter Blake Chief Officer

Hounslow Community Transport

9 Montague Road Hounslow TW3 1JY

Tel: 020 8572 8204

13th March 2018